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VIA ECF

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl St.
New York, New York 10007

May 17, 2021

Re: *In Re: Customs and Tax Administration of the Kingdom of Denmark
(Skatteforvaltningen) Tax Refund Scheme Litigation, 18-md-02865 (LAK)*

Dear Judge Kaplan:

Plaintiff Skatteforvaltningen (“SKAT”) respectfully requests that this Court issue an order permitting SKAT to file under seal its contemporaneously filed Letter Motion to Compel the Production of Documents (the “Letter Motion”), pursuant to Federal Rule of Civil Procedure 5.2, Local Civil Rule 5.2, and this Court’s Individual Rules.¹

Federal Rule of Civil Procedure 5.2(a)(1) requires that portions of social-security numbers be redacted from public filings, and this Court’s Individual Rules (at 4) direct that individuals’ home addresses be redacted from public filings unless they are relevant. Exhibit H to SKAT’s Letter Motion contains certain defendants’ social-security numbers and home addresses. Since this information is irrelevant to the Letter Motion, there is good cause for the Letter Motion to be filed under seal and for the public version of the filing to have redacted the defendants’ social-security numbers and home addresses.

SKAT has conferred with lead counsel for the defendants, who do not oppose this motion to seal.

SKAT therefore respectfully requests that the Court grant SKAT leave to file its Letter Motion under seal.

¹. This motion relates to case nos. 19-cv-01781; 19-cv-01783; 19-cv-01785; 19-cv-01788; 19-cv-01791; 19-cv-01792; 19-cv-01794; 19-cv-01798; 19-cv-01800; 19-cv-01801; 19-cv-01803; 19-cv-01806; 19-cv-01808; 19-cv-01809; 19-cv-01810; 19-cv-01812; 19-cv-01813; 19-cv-01815; 19-cv-01818; 19-cv-01870; 19-cv-01918; 19-cv-01922; 19-cv-01926; 19-cv-01928; 19-cv-01929; and 19-cv-01931.

Respectfully submitted,

/s/ Marc A. Weinstein
Marc A. Weinstein

Cc: All counsel of record via ECF